



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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October 25, 2022

Mr. Jerry Cifor
President
Green Ridge Recycling and Disposal LLC
12230 Deergrove Road
Midlothian, Virginia 23112

**Subject: Green Ridge Recycling and Disposal Facility, LLC
Notice of Intent and Part A Application – Addendum to Technical Review 2
(dated June 16, 2022)**

Dear Mr. Cifor:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) solid waste program is coordinating its review of the Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, with the Virginia Water Protection (VWP) program staff. DEQ issued a second technical review letter dated June 16, 2022 indicating that the Part A Permit Application appears to be ***technically inadequate*** and it outlined items that need to be addressed. Based on review of the Joint Permit Application (JPA) received by the VWP program, the proposed project will impact perennial stream resources located within the area of proposed disposal units. It appears that these streams within the disposal area are fed by springs or groundwater seeps.

The Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, *et seq.*) siting requirements as specified in 9 VAC 20-81-120.C.1.b. state, ***“No disposal unit or leachate storage unit shall be closer than: ... 100 feet from any perennial stream or river.”*** Additionally, 9 VAC 20-81-120.F.1.c. states, ***“Certain site characteristics may prevent approval or require substantial limitations on the site use or require the incorporation of sound engineering controls. Such site characteristics shall be identified and an explanation of precautions necessary to assure compliance with the provisions of this chapter shall be provided. Examples include:...Springs, seeps, or other groundwater intrusion into the site;...”*** The Part A Application Form, and portions of the NOI and Part A Permit Application, indicate that the distance from proposed disposal units or leachate storage areas to any perennial stream or river is 100 feet, and there are no springs present.

Based on information provided in the VWP application, the waste management boundary encompassing the proposed landfill disposal and leachate storage units does not appear to meet the VSWMR siting requirements nor has DEQ received a request for a variance to the permitting requirements as described in Part VII of the VSWMR (9 VAC 20-81-700 through 760). Please be advised that DEQ cannot determine site suitability until such time that the proposed landfill meets the VSWMR siting requirements and the applicable revisions to the NOI and Part A Permit Application have been submitted to DEQ, or DEQ receives revised copies of the NOI and Part A Permit Application and associated permit application documents demonstrating impacts to springs and perennial streams within proposed disposal and leachate storage areas and a request for a variance from the permitting requirements.

Please note the letter should not be considered a legal opinion or a case decision as defined by the Administrative Process Act, Code of Virginia § 2.2-4000 *et seq.* If you have any questions about this matter, please contact me at (804) 712-9102, or by e-mail at dean.starook@deq.virginia.gov.

Sincerely,



Dean E. Starook
Groundwater Remediation Specialist

cc: Michael D. Lawless, P.G., C.P.G., TRC Companies, Inc.
JengHwa Lyang, DEQ-VRO
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